

OCT 06 2015

Clerk, U.S. District Court
Texas Eastern

MICHAEL WILLIAMS
vs.
EPA

6:15-CV-862

MOTION FOR HEARING
SANCTIONS

DEFENDANTS
Honey Creek Village HOA - Travelers Ins.
Honey Creek Village Home owners - CENTRAL Ins.
YVONNE WRIGHT - WRIGHT WAY (INDEPENDENT CONTRACTOR)
SEPARATE INSURANCE

ALL ARE REPRESENTED BY THE SAME COUNSEL.
ALL ARE ADVERSE PARTIES.

ABA 1-7, 1-8, 1-9, 1-10

6th Circuit vs. J. DESANTIS 2012

"RECKLESS DISREGARD OF THE TRUTH OR ACTS,
"SO OBVIOUS THAT THE ACTOR MUST HAVE BEEN
AWARE OF IT"

3rd Circuit - "WILDFIRE BLINDNESS" 2012

7th Circuit - ESCAPE BY IGNORANCE

"OSTRICH INSTRUCTION"

newell